



January 14, 2025

**Via ECF**

The Honorable Sarah Netburn  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

**Re: *United States v. Andre Llacuna, 22-mj-2478***

Dear Judge Netburn,

This letter concerns my representation of Mr. Andre Llacuna in the above-captioned criminal case. I write the Court to request two amendments to Mr. Llacuna's bail conditions.

First, I respectfully request permission for Mr. Llacuna to travel with family internationally to the Philippines for a wedding in February 2025. He would depart from the U.S. on 02/08/2025, returning back on 02/21/2025. The locations at which he will stay have been provided to both U.S. Pretrial Services and the government, and his exact travel details will be provided to the parties upon any Court approval of this request.

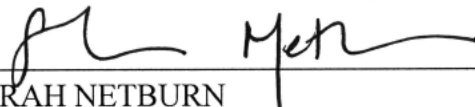
Second, in order to travel internationally, I respectfully request permission for a permanent return of Mr. Llacuna's passport from Pretrial Services, as soon as possible. We have learned that Mr. Llacuna will need to get his passport renewed before the upcoming family trip. Given the status of where he is in his case and his full compliance with both U.S. Pretrial Services and the government, we are making this request to permanently amend his bail condition to surrender all travel documents, based on the agreement that he keep his passport until further notice. This revision would still require Mr. Llacuna to receive advance permission for any other travel that would require the passport's use.

Pretrial Services, through Officer Dominique Jackson, and the government, through AUSA Nathan Rehn, have informed me that there are no objections from either party to these requests.

Thank you for the Court's consideration.

The travel request is GRANTED. The request for the permanent return of Mr. Llacuna's passport is also GRANTED.

**SO ORDERED.**

  
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SARAH NETBURN  
United States Magistrate Judge

DATED: January 14, 2025  
New York, New York